

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**RYAN HYSELL and CRYSTAL HYSELL, :**  
on behalf of their daughter, **A.H.,**  
a minor, :

***Plaintiffs,*** :

**v. :** **Case No. 5:18-cv-01375**  
**Judge Frank W. Volk**

**RALEIGH GENERAL HOSPITAL, :**  
**COMMUNITY HEALTH SYSTEMS, INC.,**  
**D/B/A ACCESS HEALTH, DEBRA :**  
**CROWDER, CNM, and**  
**THE UNITED STATES OF AMERICA, :**

***Defendants.***

**DEFENDANT, RALEIGH GENERAL HOSPITAL'S,  
MOTION TO EXCEED PAGE LIMITATIONS IN REPLYING TO PLAINTIFFS'  
RESPONSE TO DEFENDANT'S RULE 50(a) and 50(b) MOTIONS**

Comes Now Defendant, Raleigh General Hospital (RGH), D.C. Offutt, Jr., Jody Simmons, Mark R. Simonton and the law firm of Offutt Nord, PLLC, and C.J. Gideon, Bryan Essary and the law firm of Gideon, Essary, Tardio & Carter, PLC, and hereby moves this Court for the entry of an Order extending the page limitations prescribed by the Local Rules of the U.S.D.C. for the Southern District of West Virginia. In support of the foregoing motion, Raleigh General Hospital states as follows:

1. Plaintiffs filed a motion to exceed the Local Rule 328 page limitations for filing a response to Raleigh General's post-trial Rule 50 and Rule 59 motions. [Doc 324]. This motion was granted [Doc 328] and Plaintiffs filed a single thirty-four (34) page response to RGH's Rule 50(a), Rule 50(b) and Rule 59 motions [326].

2. RGH will file a separate reply to the Rule 59, motion for a new trial, response in accordance with the page limits of the Local Rules, but wishes to file a single reply to the Rule 50 response limited to twenty (20) pages.

**WHEREFORE**, for the aforementioned reasons, Raleigh General Hospital respectfully requests that this Court grant the foregoing motion and allow it to exceed the page limitations with regard to replying to Plaintiffs' Response to its Rule 50(a) and 50(b) post-trial motions.

**RALEIGH GENERAL HOSPITAL,**

**By Counsel:**

/s/ D.C. Offutt, Jr.

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\* *Pro Hac Vice*

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CERTIFICATE OF SERVICE

I, D.C. Offutt, Jr., counsel for Defendant, Raleigh General Hospital, do hereby certify that a true and exact copy of the foregoing, “*Defendant, Raleigh General Hospital’s, Motion To Exceed Page Limitations in Replying to Plaintiffs’ Response to Defendant’s Rule (50(a) and 50(b) Post-Trial Motions,*” has been served upon counsel of record via electronic filing through the Court’s ECF system, this 6<sup>th</sup> day of **August, 2021** which shall send notice of the same to the following:

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/s/ D. C. Offutt, Jr.  
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